

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

2015 MAR -2 PM 3:45

AJ Scooters, Inc.

1611 Bank Street

Baltimore, MD 21231

(Full name and address of the plaintiff)

Plaintiff(s)

vs.

USDA, Agency of the United States of America

(Full name and address of the defendant(s))

Defendant(s)

CLERK'S OFFICE  
AT BALTIMORE

BY \_\_\_\_\_ DEPUTY

Civil No.: WMN 15-588  
(Leave blank. To be filled in by Court.)

**COMPLAINT** For a review of a USDA decision  
*Request for an emergency hearing*

1. Jurisdiction in this case is based on:



Diversity (none of the defendants are residents of the state where plaintiff is a resident)



Federal question (suit is based upon a federal statute or provision of the United States Constitution)



Other (explain) USDA, Agency of the United States of America

2. The facts of this case are:

Now comes Ruth Lurz, Pro Se and President of AJ Scooters, Inc. files this emergency  
hearing to this court to review The USDA Agency decision and states onto Your Honor as follows

The officers of USDA have created hardship on the business by suspending it form the EBT  
program, based on suspicion. This suspension from the EBT program is arbitrarily and capricious.

(See Exhibit A), based on the paper conclusion of page 14. The business has been falsely  
accused of trafficking which means that food purchases made by EBT users are fraudulently  
discounted for cash by AJ Scooters, Inc. Those false accusations have caused the business to  
collapse and have put our livelihood and the livelihood of our employees in danger.

AJ Scooters, Inc. sells raw seafood. Evidence introduced by AJ Scooters, Inc. to overcome  
the suspension shows that the frequency patterns of purchases made by users of EBT cards and  
those made by users of credit cards are similar. This confirms that the allegations of trafficking  
are false and unfounded.

The agency's faulty decision has impaired out ability to earn income and has caused the  
business to face a going concern. The business is now on the verge of bankruptcy.

Therefore, the plaintiffs are seeking to be reinstated immediately in the EBT program.  
The plaintiffs are also seeking damages in the amount of one hundred eleven thousand two  
hundred ninety and 48/100 dollars, \$111,292.48, (See Exhibit B) prepared by plaintiff's  
accountant.

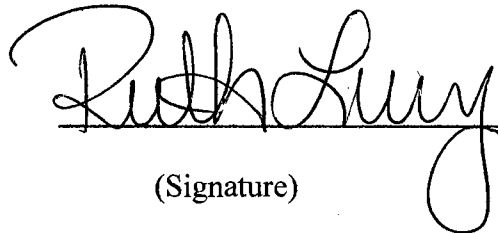
3. The relief I want the court to order is:

☒ Damages in the amount of: \$111,292.48

☐ An injunction ordering: \_\_\_\_\_

☒ Other (explain) Immediate reinstatement of AJ Scooters, Inc. into the EBT program.

February 17, 2015  
(Date)

  
(Signature)

Ruth Lurz

1611 Bank Street

Baltimore, MD 21231

443-791-7077

(Printed name, address and phone number of  
Plaintiff)

### Privacy Rules and Judicial Conference Privacy Policy

Under the E-Government Act and Judicial Conference policy, any paper filed with the court should not contain an individual's social security number, full birth date, or home address; the full name of person known to be a minor; or a complete financial account number. These rules address the privacy concerns resulting from public access to electronic case files.